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ATTORNEYS FOR APPALOOSA MANAGEMENT, LP

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re)	Chapter 11
)	
Delphi Corporation, <u>et al.</u>)	Case No. 05-44481 (RDD)
)	Jointly Administered
Debtors.)	
)	

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Appaloosa Management, LP, as Shareholder in the above jointly administered chapter 11 cases, hereby appears by and through its attorneys and requests, pursuant to Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and sections 102(1), 342 and 1009(b) of chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101, et seq. (as amended, the “Bankruptcy Code”), that all notices given or required to be given and all papers served or required to be served in any one or more of these jointly administered cases be also given to and served on:

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PLEASE TAKE FURTHER NOTICE that the foregoing request applies to and includes not only the notices and papers referenced in the Bankruptcy Rules and Bankruptcy Code, but also includes, without limitation, all orders, notices and pleadings relating to any application, motion, petition, objection, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, telephone, courier services, hand delivery, facsimile transmission, electronic mail, telex or otherwise that (1) affects, or seeks to affect, or may potentially affect in any way any rights or interests of any creditor or party-in-interest in these cases, including Appaloosa Management, LP; (2) affects, or seeks to affect (a) the above-captioned Debtors and/or their estates or (b) property or proceeds thereof in the possession, custody, or control of others that any of the Debtors or their estates may seek to use; or (3) requires or seeks to require any act, delivery of any property, payment or other conduct by Appaloosa Management, LP.

PLEASE TAKE FURTHER NOTICE that Appaloosa Management, LP does not, by filing this Notice of Appearance and Request for Service of Papers nor any subsequent appearance, pleading, claim or suit, submit to the jurisdiction of the Bankruptcy Court or intend that this Notice of Appearance constitutes a waiver of any of its respective rights: (i) to have final orders in non-core matters entered only after de novo review by a District Judge; (ii) to trial by jury in any proceeding so triable in these cases, or any controversy or proceeding related to these cases; (iii) to have the District Court withdraw the reference in any matter subject to

mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, setoffs or recoupments to which Appaloosa Management, LP is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs or recoupments are hereby reserved.

Dated: Miami, Florida
November 18, 2005

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By: /s/ John K. Cunningham
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